

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

KELLY CUNNINGHAM, <i>et al.</i> ,	)	CASE NO. 2:21-cv-01773-NBF
	)	
Plaintiffs	)	JUDGE NORA BARRY FISCHER
	)	
v.	)	
	)	
INTEGRITY STAINLESS, INC.	)	
	)	
Defendant.	)	
	)	

**MOTION FOR ADMISSION *PRO HAC VICE* OF RICHARD E. HEPP**

Richard E. Hepp, undersigned counsel for Defendant Integrity Stainless, Inc., hereby moves that Attorney Richard E. Hepp be admitted to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Defendant Integrity Stainless, Inc. in the above-captioned matter pursuant to LCvR 83.2 and LCvR 83.3, LCrR 83.2 and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this motion, undersigned counsel attaches the Affidavit for Admission *Pro Hac Vice* of Richard E. Hepp filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

February 4, 2022

Respectfully submitted,

/s/ Richard E. Hepp

Richard E. Hepp (0090448)

W. Eric Baisden (0055763)

Steven M. Moss (0055997)

Pro Hac Vice to Follow

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

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Cleveland, Ohio 44114-2378

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*Attorneys for Defendant Integrity Stainless, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 4, 2022 a copy of the foregoing *Motion for Pro Hac Vice* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

*s/ Richard E. Hepp*

Richard E. Hepp

*Attorney Defendant Integrity Stainless, Inc., a  
whole owned subsidiary of Olympic Steel, Inc.*

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	)	
Plaintiffs	)	JUDGE NORA BARRY FISCHER
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v.	)	
	)	
INTEGRITY STAINLESS, INC.	)	
	)	
Defendant.	)	
	)	

**AFFIDAVIT OF RICHARD E. HEPP IN SUPPORT OF  
MOTION FOR ADMISSION *PRO HAC VICE***

I, Richard E. Hepp, make this affidavit in support of the motion for my admission to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Defendant Integrity Stainless, Inc. in the above-captioned matter pursuant to LCvR 83.2 and LCvR 83.3 and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151).

I, Richard E. Hepp, being duly sworn, do hereby depose and say as follows:

1. I am a lawyer at the law firm of Benesch, Friedlander, Coplan & Aronoff LLP.
2. My business address is 200 Public Square, Suite 2300, Cleveland, Ohio 44114.
3. I am a member in good standing of the bar[s] of the Supreme Court of Ohio, the U.S. Court of Appeals for the Sixth Circuit, the U.S. Court of Appeals for the District of Columbia Circuit, the U.S. District Court for the Northern District of Ohio, and the U.S. District Court for the Southern District of Ohio.
4. My bar identification number is Ohio 0090448.
5. A current certificate of good standing from the Ohio Supreme Court is attached to this Affidavit as **Exhibit A**.
6. The following are a complete list of any previous disciplinary proceedings concerning my practice of law that resulted in a non-confidential negative finding or sanction by the disciplinary authority of the bar of any state or any United

States court: **Not applicable- No such proceedings**

7. I attest that I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.
8. I attest that I have read, know and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.
9. Based upon the foregoing, I respectfully request that I be granted pro hac vice admission in this matter.

I certify and attest that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Dated: February 4, 2022

  
Richard E. Hepp

SWORN TO BEFORE ME and subscribed in my presence, this 4 day of February, 2022.



NOTARY PUBLIC

My Commission Expires:



**ADAM E. PRIMM**  
Attorney At Law  
NOTARY PUBLIC  
STATE OF OHIO  
My commission has  
no expiration date.  
Section 147.03 O.R.C.

# **EXHIBIT A**



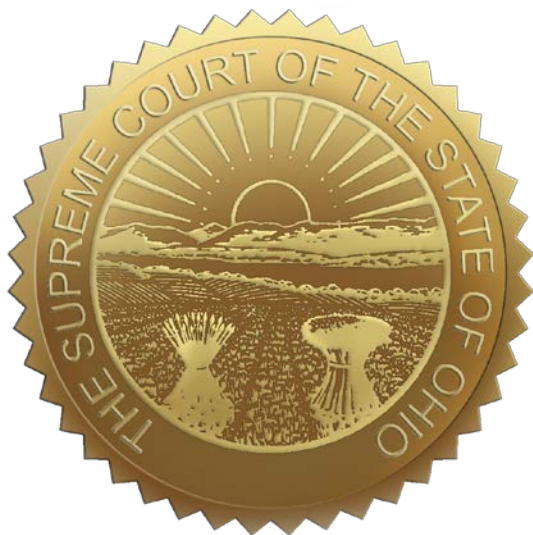
# THE SUPREME COURT *of* OHIO

## CERTIFICATE OF GOOD STANDING

I, GINA WHITE PALMER, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

**Richard Eric Hepp**  
Attorney Registration No. **90448**

was admitted to the practice of law in Ohio on November 4, 2013; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.



IN TESTIMONY WHEREOF, I have  
subscribed my name and affixed the seal of  
the Supreme Court, this 3rd day of  
February, 2022.

GINA WHITE PALMER  
*Director, Attorney Services Division*

A blue ink signature of Bradley J. Martinez.

Bradley J. Martinez  
*Attorney Services Counsel*



No. 2022-02-03-1

Verify by email at [GoodStandingRequests@sc.ohio.gov](mailto:GoodStandingRequests@sc.ohio.gov)

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	)	
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**ORDER GRANTING MOTION FOR PRO HAC VICE  
ADMISSION OF RICHARD E. HEPP**

This matter came before this Court on the *Motion for Admission Pro Hac Vice of Richard E. Hepp* in the above-captioned case. This Court having considered the same is of the opinion that the Motion should be granted.

IT IS, THEREFORE, ORDERED that the *Motion for Pro Hac Vice Admission of Richard E. Hepp* is GRANTED.

IT IS FURTHER ORDERED that Richard E. Hepp is admitted pro hac vice to participate in all of the proceedings of the above-captioned case.

SIGNED this \_\_\_\_ day of \_\_\_\_\_ 2022.

\_\_\_\_\_  
HONORABLE JUDGE NORA BARRY FISCHER